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May 21, 2004

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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ALLTEL Communications, Inc. Petitions for Designation as an Eligible
Telecommunications Carrier in Rural Service Areas in the States of Virginia,
Alabama, North Carolina, Georgia and Florida
CC Docket No. 96-45, DA Nos. 03-1881, 03-1882, 03-3824, 03-3825, 04-999

Dear Ms. Dortch:

By this letter, ALLTEL Communications, Inc. ("ALLTEL") seeks the voluntary dismissal of the above-referenced petitions seeking designation as an eligible telecommunications carrier ("ETC") in rural service areas ("Rural Petitions"), without prejudice to any subsequent refiling of those requests. ALLTEL has supplemented its ETC petitions for non-rural service areas ("Non-Rural Petitions"),¹ and intends to continue to vigorously prosecute them.² For the reasons set forth below, ALLTEL has determined, however, not to supplement the Rural Petitions at this time.

¹ Letter from G. Rabin, ALLTEL, to M. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45, DA Nos. 03-1881, 03-1882, 03-3824, 03-3825 (Mar. 1, 2004) (supplementing ALLTEL's non-rural requests for ETC status).

² See Reply Comments of ALLTEL Communications, Inc., *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45 (May 14, 2004) (replying to oppositions to its non-rural ETC petitions). ALLTEL is also continuing to prosecute its two pending requests for Commission approval of state commission service area

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ALLTEL bifurcated its ETC petitions into separate rural and non-rural requests for ETC status in response to the different standards governing the grant of rural and non-rural petitions under the Communications Act and in the Commission's prior decisions granting ETC status to other carriers.³ Following the *Virginia Cellular*⁴ and *Highland Cellular* decisions⁵ and the recent recommendations of the Federal-State Joint Board on Universal Service in the Portability proceeding,⁶ however, significant uncertainty exists respecting the time frame in which the Rural Petitions will be processed.

ALLTEL voluntarily withdraws its Rural Petitions to permit the Commission to focus its scarce resources on ALLTEL's Non-Rural Petitions, which have been pending for an inordinate period of time.⁷ ALLTEL believes that this approach will promote both regulatory economy and the highest use of the Commission's scarce resources to ensure a grant of the Non-Rural Petitions at the earliest possible date.

redefinition decisions. *See, e.g.*, letter from C. Tritt, counsel to ALLTEL, to M. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45, DA Nos. 04-565, 04-999 (May 14, 2004) (further supplementing request for approval of the Wisconsin Public Service Commission's redefinition of Wisconsin rural carrier service areas).

³ Letter from C. Tritt, counsel to ALLTEL, to M. Dortch, Secretary, Federal Communications Commission, CC Docket No. 96-45, DA Nos. 03-1881, 03-1882 (Nov. 10, 2003) (bifurcating ALLTEL's requests for ETC status in rural and non-rural areas).

⁴ *Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier for the Commonwealth of Virginia*, 19 FCC Rcd 1563 (2004) ("*Virginia Cellular*").

⁵ *Highland Cellular, Inc. Petition for Designation as an Eligible Telecommunications Carrier for the Commonwealth of Virginia*, CC Docket No. 96-45, FCC 04-37 (Apr. 12, 2004) ("*Highland Cellular*").

⁶ *Federal-State Joint Board on Universal Service*, Recommended Decision, CC Docket No. 96-45, FCC 04J-1 (JB Feb. 27, 2004).

⁷ *See, e.g.*, Application of ALLTEL Communications, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Virginia, *Application of ALLTEL Communications, Inc. For Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act of 1934*, CC Docket No. 96-45 (filed Apr. 14, 2003); First Amendment to the Application of ALLTEL Communications, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Virginia, *Application of ALLTEL Communications, Inc. For Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e)(6) of the Communications Act of 1934*, CC Docket No. 96-45 (May 21, 2003).

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Please direct any questions as to this matter to the undersigned.

Yours truly,

/s/ Cheryl A. Tritt

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